

*Statewide  
Interoperability  
Executive  
Committee*

*Jonathon E. Monken  
Director, Illinois State Police  
Chair, State Interoperable  
Executive Committee*

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December 6, 2010

James Arden Barnett, Jr., Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Julius Knapp, Chief  
Office of Engineering and Technology  
Federal Communications Commission  
445 12th Street, S.W.  
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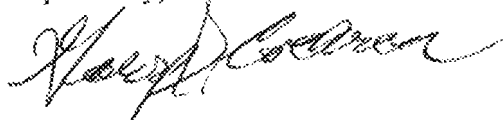
Re: PS DOCKET No. 10-233 DA 10-2180

Letter in Support of Request for Waiver Filed by Thales Communications, Inc.  
Liberty™ Multiband Land Mobile Radio – FCC ID: OKC-4102023501

Mr. Barnett and Mr. Knapp:

This letter is filed in support of the "Request for Limited Waiver of Commission Rules to Permit Temporary Extension of Equipment Authorization to Include 775-776 MHz/805-806 MHz and Related Relief" ("Thales Waiver Request") filed by Thales Communications, Inc. ("Thales"). This letter is also meant to support any other device manufacturer whose subscriber unit has the potential of operating on the Illinois statewide 700/800 MHz trunked radio system.

Respectfully,



Gary Cochran  
Acting Chair – Statewide Interoperability Executive Committee  
Illinois State Police  
cc: Lieutenant Deb Edwards, Illinois State Police

*Illinois Statewide Interoperability Executive Committee  
801 South Seventh Street, One Main, P.O. Box 19461  
Springfield, Illinois 62794  
Attn: Leslie Ivers, Secretary*

I am Gary Cochran, Chairperson of the Illinois Statewide Interoperability Committee (SIEC), a committee, formed by the Illinois State Legislature to support radio interoperability. The SIEC has on its roster members that represent all Illinois State Agency radio users. In addition the SIEC also has members that represent the nine hundred plus law enforcement agencies, twelve hundred fire/ EMS agencies as well as Emergency Management, many other public safety disciplines and NGO's. As the Commission is aware, by *Order* dated July 18, 2008,<sup>1</sup> the Federal Communications Commission ("FCC") granted in part a waiver request filed by the State of Illinois, Illinois State Police ("Illinois") which allowed Illinois to continue to deploy, on an interim basis, new 700 MHz narrowband operations outside of the consolidated narrowband channel scheme adopted in the FCC's 2007 Second Report and Order.<sup>2</sup> Because Illinois has been granted a waiver to deploy new 700 MHz narrowband operations outside of the consolidated narrowband channels, the Thales Waiver Request is of great interest and relevance to Illinois.

The SIEC and numerous other organizations have reviewed the Thales Waiver Request and respectfully suggest that the FCC grant the Thales Waiver Request on an expedited basis. The SIEC has concluded that expedited grant of the Thales Waiver Request by the FCC would be consistent with the policies underlying the Illinois Waiver Order and would be in the public interest for the following reasons: Although Illinois has been permitted to temporarily continue operation on 775-776 MHz/805-806 MHz under the Illinois Waiver Order, the legacy equipment currently available to Illinois for such operation is single band capable only and most cannot transition to the future 6.25 KHz spectrum efficiency in 700 MHz, and therefore does not afford Illinois the benefits of newly developed multi-band radio technology which Thales describes in the Thales Waiver Request. Other manufacturers also have multiband capable equipment available, however the manufacture of such equipment in the 775-776 MHz / 805-806 MHz ranges is not currently type accepted. We also suggest a "me too" consideration for other manufacturers that may wish to align themselves with this waiver request. - The current limitation can potentially impact interoperability in Illinois by:

1. Creating a shortage of multi-band subscriber equipment for use by public safety agencies
2. Forcing the purchase of legacy equipment to meet subscriber communications needs.
3. Reducing interoperability on the statewide 700/800 MHz radio system by reducing the availability of FCC type accepted equipment.
4. Limiting the number FCC type accepted multi-band subscriber units available from various manufacturers, thus limiting what should be a competitive market place.
4. Restricts the number of users that can be placed on the statewide radio system due to current equipment technical limitations.
5. Create operational problems for system users when roaming to sites with frequencies limited to 775/776 MHz and 805/806 MHz without the frequency capability on their subscriber device.

- In addition, this limitation has significant financial impacts, such as:

1. Creating the poor choice of utilizing funds to buy legacy (old) technology instead of maximizing the use of funds by purchasing subscriber units with the newest and most efficient technology.
2. Being forced to purchase subscriber units that cannot migrate to future 6.25 KHz spectrum efficiency.
3. Negates the ability to effectively maximize the

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use of Federal grant dollars to buy the most effective and efficient subscriber equipment.

Today there are approximately 19,000 subscriber units on the statewide 700/800 MHz trunked radio system. The system provides daily operability and interoperability amongst local public safety radio users, the Illinois State Police and many other State and local agencies. The ability to have this level of efficient radio communications helps safeguard the residents and visitors in the State of Illinois. Not having a sufficient supply of type accepted multiband subscriber devices will stifle the ability of public safety agencies and others to communicate effectively. We respectfully ask that you grant the waiver in an expedited manner as requested, so that Illinois may continue to enjoy the highest level of radio operability and interoperability without technical limitations. We also ask in this consideration again to include all of the manufacturers who wish to follow and support Thales' waiver request in this matter for their own benefit. A positive response to the waiver request would be in the public interest because of the substantial technical, operational and financial benefits that can be made to the ability of Illinois public safety agencies to best serve our citizens.

<sup>1</sup> Order, DA 08-1696 (PSHSB, Released July 18, 2008) ("Illinois Waiver Order").

<sup>2</sup> Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band; Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010, PS Docket No.06-229, WT Docket No. 96-86, *Second Report and Order*, 22 FCC Red 15289 (2007).

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